Position Paper :

Animal Welfare Indicators

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Plant/Animal Health & Welfare

copa cogeca

european farmers european agri-cooperatives





INTRODUCTION

The increasing use of animal welfare indicators (AWIs) demonstrates the commitment of European farmers and cooperatives to continuously improve animal welfare and to make this effort more visible and measurable.

AWIs are already used in several sectors and supply chains, but their design and practical use depend strongly on species, production systems and local conditions, and rely on a direct, context-specific understanding of farms and their environment.

Based on the current use of AWIs and farmers' and cooperatives' experience on the ground, this paper sets out Copa and Cogeca's views on the objectives and scope of AWIs at EU level, in particular in the event that such indicators are incorporated into European legislation, as well as the need to build on existing systems, the potential benefits and opportunities for the sector, and the main risks and conditions that must be addressed for any future EU framework on AWIs.

Objectives and scope of Animal Welfare Indicators

Copa and Cogeca consider it essential to clarify the objectives, opportunities, and limitations of animal welfare indicators (AWIs) and the role that any EU framework should play.

At farm level, AWIs would primarily **support farmers in implementing good husbandry and handling practices while also driving continuous improvement in animal welfare, mainly through self-monitoring, prevention, advice and better management decisions.** Although they can help assess animal welfare as promoted by legal standards and private schemes, they **should not become the main legal enforcement trigger, nor a sanctioning instrument or additional compliance layer.**

If developed at EU level, AWIs should primarily provide a practical toolbox of best practices that **supports farms and cooperatives, promotes innovation and flexibility and helps ensure fair competitive conditions and a level playing field** within the EU and vis-à-vis imports, based on comparable and measurable welfare outcomes. In this context, it is essential that animal welfare indicators are interpreted against a clear regulatory baseline. For EU producers, this baseline is defined by existing European animal welfare legislation. When AWIs are used for benchmarking or comparisons with third countries, the interpretation of the results must therefore take into account whether the production system complies with EU legislation. The same indicator value could otherwise be obtained under very different regulatory conditions, which would risk creating misleading comparisons.

Any EU approach must remain voluntary, proportionate and appropriate to each sector and production methods. It should also focus on relevant on-farm indicators, complemented by indicators collected at the slaughterhouse level where relevant.

In addition, AWIs must remain dynamic tools, capable of evolving as scientific knowledge develops, particularly as species-specific understanding of animals' physical and behavioural condition improves.

For Copa and Cogeca, AWIs are only acceptable if they form a **balanced mix of animal-based, resource-based and management-based indicators,** used in a way that **reduces rather than increases administrative burden** and which is introduced step by step (with piloting, voluntary schemes, and adequate training and advisory support. It should not be a question of creating a new general legal obligation for their use, but rather of encouraging wider uptake through incentives and the gradual standardisation of indicators.

Building on current use and existing systems

CURRENT USE IN THE EU MEMBER STATES

Animal welfare indicators or similar data are already used in many Member States, though their **uptake is uneven and far from universal.** When applied, they are most often embedded in:

- private quality schemes, retailer or processor requirements, national certification systems (e.g. organic or national labels), or;
- sectoral schemes and codes of good practice.

Depending on the system, data is collected by a combination of farmers, veterinarians, cooperatives, independent auditors and slaughterhouses. Depending on each sector and where the data is collected, the frequency for data collection varies.

Where such data and systems already exist, **any EU discussion on AWIs must build on them, recognise them and avoid duplication or parallel structures,** while also identifying and phasing out elements that have proven ineffective in practice.

At the same time, in some Member States or sectors, AWIs are not used at all or only to a limited extent, often due to structural, economic, regulatory, advisory or technical barriers, including fragmented data systems where information exists but is stored in incompatible databases, not linked back to farms and not consolidated for policy use.

DATA COLLECTION AND OWNERSHIP

It should be assessed which mix of farmers, veterinarians, cooperatives, slaughterhouses or independent bodies is most appropriate for collecting the data, so that the primary responsibility for data collection does not fall on farmers. In all cases, **ownership and primary control of on-farm, animal-related data must remain with farmers,** with clear and transparent conditions for any voluntary sharing with **their cooperatives, producer organisations** and the authorities.

The frequency of data collection must be adapted to each sector and production system and must remain proportionate and feasible.

Given this diversity, **any EU-level AWIs should remain voluntary and incentive-based.** Data collection should not fall on farmers and their cooperatives as further administrative burden should be avoided.



Benefits and opportunities for farmers and cooperatives in using Animal Welfare Indicators

When animal welfare indicators are simple, practical and cost-effective to implement, they are generally welcomed by farmers and cooperatives as they help detect problems at an early stage and allow for quick or even preventive interventions. Properly designed AWIs can support a shift from purely resource-based rules towards more outcome-oriented approaches, possibly offering a useful decision-making tool for farmers without adding new layers of rigid controls.

The use of **digitalisation and new technologies** could potentially provide part of the solution, provided that they reduce manual input and cost. These technologies must remain proportionate in terms of cost and not impose significant expenses on farmers for limited benefit.

Used in this way, AWIs can contribute to **greater transparency and trust** along the value chain.



Risks and limitations of Animal Welfare Indicators

While animal welfare indicators can be useful tools for improving practices and assessing existing levels of welfare, there are significant risks and limitations that must be addressed.

As many sectors already use their own systems, **any EU initiative must build on existing tools, rather than duplicating them or creating new constraints.** The development of future approaches should be undertaken with the relevant stakeholders and follow a one-health approach, taking into account animal health and welfare, biosecurity, working conditions, environmental aspects and socio-economic impacts.

A key concern is **cost and administrative burden,** especially for small and medium farms. Collecting AWIs requires time, documentation and sometimes new investments; any new obligations must be proportionate, supported through adequate financial instruments, including support for structural adaptations, digital investments and advisory services where necessary, and must not become unfunded reporting duties. At the same time, higher EU expectations must go hand in hand with equivalent requirements for imports to preserve a fair level playing field.

Another concern is **subjectivity and legal certainty.** Some indicators are open to interpretation and, if used in legislation or controls, may lead to inconsistent assessments and legal insecurity. This places high demands on the knowledge of inspectors, assessors, advisors and consultants involved in the implementation and controls – both regarding animal species and the production systems – in order to ensure legally sound and consistent assessments. AWIs must therefore be scientifically robust and adapted to the diversity of European livestock systems – intensive and extensive, indoor and outdoor, and across climates – so that they reflect real welfare outcomes and do not penalise well-functioning systems simply because they differ from a standardised model. It is also important that animal welfare is measured throughout the entire life of the animal or at key stages in its life rather than at only arbitrary points in time unrelated to those stages.

As previously mentioned, indicators must also not be transferred mechanically from one species or production type to another as this would generate misleading assessments.

Finally, some outcome indicators, such as certain fractures or skin/plumage damage or mortality rate, may be difficult to measure consistently on farm and are strongly influenced by factors beyond farmers' control (predators, noise, weather, specific lot behaviour, pecking, piling, etc.); their use must, therefore, be carefully assessed to avoid unfairly penalising farms without offering realistic corrective options.



CONCLUSION

Copa and Cogeca are open to a broader use of AWIs in the EU, provided that they genuinely help assess animal welfare along the chain in a transparent, comparable and practical way. Farmers and cooperatives have gained valuable experience with what works in practice in private schemes where Animal Welfare Indicators are used and have developed robust, practical indicators adapted to diverse species and systems.

We also support the development of voluntary certification schemes using AWIs as these can effectively improve animal welfare while responding to market demand and testing consumers' actual willingness to pay more for higher-welfare products.

Against this backdrop, **Copa and Cogeca do not support the introduction of any new legislation obliging farmers to systematically collect and/or report AWIs to competent authorities.** Before considering any EU-wide initiative, the European Commission should:

1. support the development of digital infrastructure and tools to facilitate voluntary use, efficient collection, data processing and interpretation of AWIs;

2. officially recognise existing AWI-based systems designed to be transferable and applicable more widely across different EU regions;

3. guarantee that AWIs are used primarily as a management and improvement tool rather than as a sanctioning instrument so farmers have trust in them;

4. avoid any new reporting obligations for farmers and cooperatives;

5. ensure permitting procedures are streamlined for those who want to improve animal welfare on their farm; and

6. ensure through international trade agreements that imported products comply with equivalent standards to those produced in the EU to ensure a level playing field for European farmers and agri-cooperatives.



Copa and Cogeca, founded respectively in 1958 and 1959, form the united voice of farmers and agri-cooperatives in the EU.

Copa members represent leading farming unions at national level, speaking for millions of farmers across Europe. Cogeca members represent the interests of the thousands of agricultural cooperatives in Europe.

Our democratic organisations, led by elected representatives, embody the vibrant diversity of European agriculture across all 27 EU Member States.

We are the collective voice of farmers and agricooperatives of all sizes and specialisations dedicated to the daily production of crops, livestock or mixed farming, encompassing both conventional and organic practices. Together, we ensure that EU agriculture is sustainable, innovative and competitive, guaranteeing food security to half a billion people throughout Europe and contributing to reducing food insecurity globally.

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